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April 12, 2022

By ECF

Hon. Nelson S. Román
United States District Judge
United States Courthouse
300 Quarropas Street
White Plains, NY 10601

Re: Marc H. Fishman v. City of New Rochelle, et al., Docket No. 19-CV-265 (NSR)
Our File No. 07367.00109

Dear Judge Román:

We represent the City of New Rochelle, Police Officer Lane Schlesinger, Retired Police Commissioner Joseph F. Schaller, Sergeant Myron Joseph and Police Commissioner Robert Gazzola in the referenced action.

On April 11, 2022, plaintiff filed a declaration in support of a motion for pre-motion conference that is riddled with unredacted personal identifying information concerning the individual City Defendants including: home addresses, partial dates of birth, partial social security numbers, the names of non-parties living at particular addresses, email addresses, Vehicle Identification Numbers, real property records, mortgage information, and phone numbers.

We emailed plaintiff's counsel this morning and requested that he immediately remove the declaration and exhibits and re-filed with the personal identifying information in redacted form. We have yet to hear from him and are not sure whether he has received our communication. Given the extremely sensitive nature of the information that is now publicly filed on the Court's Electronic Filing System, we request that the Court strike plaintiff's counsel's declaration, Docket Entry No. 67, and each of the exhibits thereto, from the Court's public docket.

Respectfully submitted,

WILSON, ELSE, MOSKOWITZ, EDELMAN & DICKER LLP

A handwritten signature in dark ink, appearing to read 'Lalit K. Loomba', written over a horizontal line.

Lalit K. Loomba

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Cc : Counsel of Record via ECF

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